

TURNER LAW FIRM, LLC

BY: ANDREW R. TURNER, ESQ.

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Attorneys for Protective Insurance Company,

Proposed Intervener

ART 8574

In re NEW ENGLAND MOTOR FREIGHT INC., et al Debtors	UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Case No. 19-12809 (JKS) Chapter 11
Plaintiffs NEW ENGLAND MOTOR FREIGHT INC., et al v. Defendants PARTIES LISTED ON EXHIBIT A TO THE COMPLAINT and JOHN DOES 1- 100	Adversary No. 19-1119 (JKS) NOTICE OF MOTION TO INTERVENE

TO: Karen A. Giannelli, Esq.

Mark B. Conlan, Esq.

Brett S. Theisen, Esq.

Gibbons P.C.

One Gateway Center

Newark, New Jersey 07102

Attorneys for Debtors and Debtors-in-Possession

PLEASE TAKE NOTICE that on April 16, 2019 at 10:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, the

undersigned attorneys for proposed intervenor Protective Insurance Company shall move before the United States Bankruptcy Court located at 50 Walnut Street, Newark, New Jersey, based upon the attached papers for an order granting leave to intervene and injunctive relief.

Please take further notice that if you wish to contest the within motion, you must with the office of the Clerk of the Bankruptcy Court and serve upon the undersigned not later than ten (10) days in advance of the aforesaid hearing, responding papers stating with particularity the basis of your opposition to the within motion.

The proposed form of order granting the relief sought is enclosed.

If no responsive pleadings are filed, then the motion will be considered unopposed.

The moving party requests oral argument.

TURNER LAW FIRM, LLC
Attorneys for
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Proposed Intervener

BY: /s/ Andrew R. Turner
ANDREW R. TURNER

Dated: April 12, 2019